

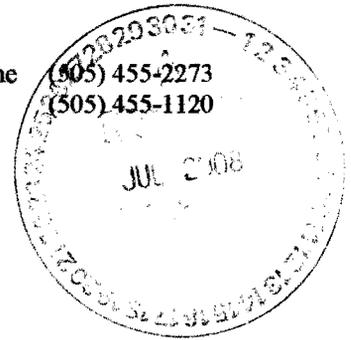
TA54

Office of Governor  
Leon T. Roybal



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SI08-DECP-416

July 23, 2008

James Bearzi, Bureau Chief  
NMED Hazardous Waste Bureau  
2905 Rodeo Park Drive West, Building 1  
Santa Fe, NM 87505-6303

Dear Mr. Bearzi:

The Pueblo de San Ildefonso (Pueblo) Department of Environmental and Cultural Protection (DECP) has completed a review of the Corrective Measures Evaluation for Material Disposal Area L. Comments are included below.

Please note that the Pueblo borders TA-54, so activities at TA-54 are of great concern to us. Also, the time frames presented in the report are essentially meaningless to the Pueblo. We will occupy our lands for many generations to come, so even 100 years of Institutional Control is trivial. For these reasons, we desire a more protective remedy than proposed by the facility. Please see our comments below.

Thank you for providing the opportunity to address our concerns.

Sincerely,

Neil S. Weber, Director  
Department of Environmental and  
Cultural Preservation  
Pueblo de San Ildefonso

Enclosure

30549



**Comments on the Corrective Measures Evaluation Report for  
Material Disposal Area L, Solid Waste Management Unit 54-006, at  
Technical Area 54**

**GENERAL COMMENTS**

1. The time periods cited in the report (i.e. 30, 60, and 100 years) for monitoring and operation and maintenance are very short-lived to the Pueblo. The people of San Ildefonso will be down-gradient of LANL and MDA-L for generations to come, and Pueblo land borders TA-54. Discussions of protectiveness of the various options should reflect this.
2. From the report; "Because the last drums were placed in shafts in 1985, most drums are predicted to fail by 2055". This source term is a great concern to the Pueblo. Because of the possibility of drums failing and adding to the liquid contaminant volume in the sub-surface, the Pueblo endorses Alternative 5A, Engineered ET Cover, Partial Waste Excavation with Off-site Disposal, SVE, Monitoring and Maintenance. As per Chapter 8 of the report, 5A scores well in all the selection criteria, and provides for acceptable protection of the people and resources of the Pueblo de San Ildefonso.
3. The life span of concrete should be discussed. After the O & M period ends, the concrete will crack and otherwise weather, allowing moisture to pass through it.
4. Surge beds may be present under Area L. These would constitute a fast path for precipitation/contaminants to reach groundwater. The subject should be given more consideration than is present in the report.

**SPECIFIC COMMENTS BY SECTION**

- 6.3 Description of Preliminary Corrective Measure Alternatives  
Comment: It is a great concern to the Pueblo that most drums are predicted to fail by 2055.
- 8.0 SELECTION OF THE PREFERRED CORRECTIVE MEASURE ALTERNATIVES
- 8.2.1 Achieving Cleanup Objectives in a Timely Manner  
Comment: Alternative 5A is preferable for timeliness.
- 8.2.2 Protect Human Health and Ecology  
Comment: Alternative 5A provides an acceptable level of assurance.
- 8.2.3 Control or Eliminate Sources of Contamination  
Comment: Alternative 5A is preferable for achieving this criterion.
- 8.2.4 Control Migration of Released Contaminants  
Comment: Alternative 5A is protective of groundwater.
- 8.2.5 Manage Remediation Waste in Accordance with State and Federal Regulations  
Comment: Alternative 5A provides the required long-term protection.